



**BellSouth Telecommunications, Inc.**

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June 29, 2000

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VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

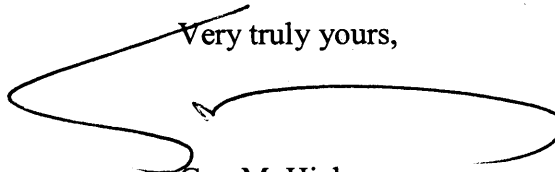
REC'D TN  
REGULATORY AUTH.  
JUN 29 PM 3 03  
OFFICE OF THE  
EXECUTIVE SECRETARY

Re: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*  
Docket No. 99-00948

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Objections to Intermedia's First Interrogatories. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

**IN RE:**    *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

**Docket No. 99-00948**

**BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO**  
**INTERMEDIA'S FIRST INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following objections to the Interrogatories of Intermedia Communications, Inc. ("Intermedia").

**GENERAL OBJECTIONS**

1.        BellSouth objects to each Request to the extent that it purports to impose upon it any obligations more onerous or far reaching than those provided for in the Tennessee Rules of Civil Procedure or any other applicable statute, rule, or regulation.
2.        BellSouth objects to each Request to the extent it would require BellSouth to reveal information or documents that are protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable privilege.
3.        BellSouth objects to each and every Request insofar as the Request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth objects to each Request to the extent that it is not addressed to the remaining issues to be arbitrated in this proceeding or that it relates to issues that have been withdrawn from the proceeding. BellSouth will attempt to note each instance where this objection applies.

4. BellSouth objects to each Request to the extent that it would require BellSouth to create or produce a document it does not maintain in the ordinary course of business.

5. BellSouth objects to each and every Request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

6. BellSouth has interpreted Intermedia's Requests to apply to BellSouth's regulated intrastate operations in Tennessee and will limit its answers accordingly. To the extent that any Request is intended to apply to matters other than Tennessee intrastate operations subject to the jurisdiction of the Authority, BellSouth objects to such Request to produce as irrelevant, overly broad, unduly burdensome and oppressive.

7. BellSouth objects to the Definitions and Instructions to these Interrogatories to the extent that they seek electronic copies (e.g., diskettes). BellSouth will produce hard copies of responsive documents.

#### **SPECIFIC OBJECTIONS TO DATA REQUESTS**

**Interrogatory No. 45:** If the answer to the immediately preceding interrogatory is in the affirmative, please identify the interconnection agreements.

**Objection:** BellSouth objects to this interrogatory on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth also objects to this interrogatory to the extent that it seeks the production of interconnection agreements that are readily available for public inspection at the Tennessee Regulatory Authority.

**Interrogatory No. 87:** Has BellSouth entered into an MTA interconnection agreement in which the interconnecting carrier is required to establish points of interconnection at all BellSouth access tandems where its NXXs are "homed"? If the answer is in the affirmative,

please identify the interconnection agreements, the dates on which the interconnection agreements were signed, and the parties to the interconnection agreements.

**Objection:** BellSouth objects to this interrogatory to the extent that it seeks the production of interconnection agreements that are readily available for public inspection at the Tennessee Regulatory Authority.

**Interrogatory No. 88:** Has BellSouth entered into an MTA interconnection agreement in which the interconnecting carrier is not required to establish points of interconnection at all BellSouth access tandems where its NXXs are “homed”? If the answer is in the affirmative, please identify the interconnection agreements, the date on which the interconnection agreements were signed, and the parties to the interconnection agreements.

**Objection:** BellSouth objects to this interrogatory to the extent that it seeks the production of interconnection agreements that are readily available for public inspection at the Tennessee Regulatory Authority.

**Interrogatory No. 111:** Has the Authority adopted, in an arbitration proceeding, some or all of the performance measures imposed by the Texas PUC upon SWBT?

**Objection:** The Authority’s Orders speak for themselves and therefore, BellSouth objects to this request.

**Interrogatory No. 112:** If the answer to the immediately preceding interrogatory is in the affirmative, please identify the proceeding and explain the metrics adopted by the Authority.

**Objection:** The Authority’s Orders speak for themselves and therefore, BellSouth objects to this request.

**Interrogatory No. 113:** Has the Authority adopted, in an arbitration proceeding, some or all of the self-executing enforcement mechanisms imposed by the Texas PUC upon SWBT?

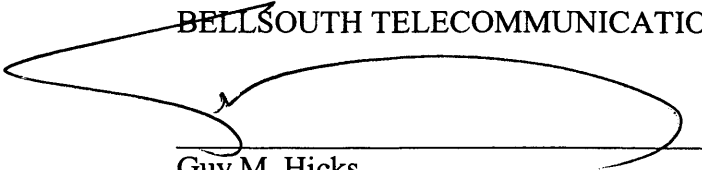
**Objection:** The Authority's Orders speak for themselves and therefore, BellSouth objects to this request.

**Interrogatory No. 114:** If the answer to the immediately preceding interrogatory is in the affirmative, please identify the proceeding and explain the self-executing enforcement mechanisms adopted by the Authority.

**Objection:** The Authority's Orders speak for themselves and therefore, BellSouth objects to this request.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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## CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

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